

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)) Chapter 11
))
MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), <i>et al.</i> , ¹)) Case No. 22-90273 (MI)
))
Debtors.)) (Jointly Administered)
))

**DEBTORS' SECOND AMENDED² WITNESS AND
EXHIBIT LIST FOR FEBRUARY 16, 2023 HEARING**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file this Amended Witness and Exhibit List for the hearing to be held on February 16, 2023, at 1:30 p.m. (prevailing Central Time).

WITNESSES

The Debtors may call the following witnesses at the hearing:

1. Stephenie Kjontvedt, Vice President, Senior Consultant of Epiq Corporate Restructuring, LLC;
2. Scott Tillman, manager of Pi Consulting, LLC and independent director of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors' service address for the purposes of these chapter 11 cases is 300 North LaSalle, Suite 1420, Chicago, Illinois 60654.

² Amended items appear in **bold** font.

the board of directors of the Debtors;

3. Ryan Mersch, Senior Director of Portage Point Partners, LLC, the financial advisor to the Debtors;
4. Drake Harvey, President of the Debtors
5. Harold Coulby, Debtors' Chief Financial Officer and Treasurer;
6. Any witness called by any otherparty;
7. Impeachment witnesses as necessary; and
8. Any witness necessary to rebut testimony of a witness called or designated by any party.

EXHIBITS

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER HEARING
1	<i>Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots Cast on the Second Amended Joint Liquidating Chapter 11 Plan of Compute North Holdings, Inc. and Its Debtor Affiliates [Docket No. 936]</i>						
2	<i>Declaration of Scott Tillman, Independent Director of Compute North Holdings, Inc., in Support of the Debtors' Joint Liquidating Chapter 11 Plan [Docket No. 939]</i>						
3	<i>Declaration of Ryan Mersch in Support of (I) Final Approval of Disclosure Statement, (II) Confirmation of Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and Its Debtor Affiliates and (III) the Debtors' Omnibus Reply to Objections Thereto [Docket No. 940]</i>						
4	<i>Declaration of Drake Harvey, President of the Debtors, in Support of (I) Final Approval of Disclosure Statement, (II) Confirmation of Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.)</i>						

	<i>and Its Debtor Affiliates and (III) the Debtors Omnibus Reply to Objections Thereto [Docket No. 941]</i>					
5	<i>Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and Its Debtor Affiliates [Docket No. 889]</i>					
6	<i>Disclosure Statement for the Second Amended Joint Liquidating Chapter 11 Plan of Compute North Holdings, Inc. and Its Debtor Affiliates [Docket No. 683]</i>					
7	<i>Plan Supplement [Docket No. 835]</i>					
8	<i>Notice of Filing of Amendment to Plan Supplement [Docket No. 843]</i>					
9	<i>Stipulation and Agreed Order [Docket No. 873]</i>					
10	<i>Stipulation and Agreed Order [Docket No. 891]</i>					
11	<i>Stipulation and Agreed Order [Docket No. 892]</i>					
12	<i>Stipulation and Agreed Order [Docket No. 893]</i>					
13	<i>Stipulation and Agreed Order [Docket No. 901]</i>					
14	<i>Stipulation and Agreed Order [Docket No. 902]</i>					
15	<i>Stipulation and Agreed Order [Docket No. 903]</i>					
16	<i>Stipulation and Agreed Order [Docket No. 904]</i>					
17	<i>Declaration of Ryan Mersch in Support of Debtors' Objection</i>					

	<i>to Claim No. 42 of Bitnile, Inc. for Contract Rejection Damages [Docket No. 964-1]</i>						
18	<i>Master Agreement, dated August 15, 2022, between Compute North LLC and BitNile, Inc. [Docket No. 964-3]</i>						
19	<i>Corporate Organizational Chart [attached]</i>						
20	Any exhibit designated or used by the Debtors or any other party.						
21	Any exhibit necessary to rebut the evidence or testimony of any witness called or designated by the Debtors or any other party.						
22	Any document or pleading filed in the above-captioned cases.						
23	Any exhibit necessary for impeachment and/or rebuttal purposes.						

RESERVATION OF RIGHTS

The Debtors reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this Amended Witness and Exhibit List prior to the hearing.

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Dated: February 15, 2023
Houston, Texas

/s/ James T. Grogan III

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Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that on February 15, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ James T. Grogan III

James T. Grogan III